

**UNITED STATES DISTRICT COURT
DISTRICT OF MAINE**

Federal National Mortgage Association

Plaintiff

v.

Melissa J. Freeman, et al.

Defendants

And

HSBC Mortgage Services, et al.

Case No. 1:22-cv-00361-NT

Final Pre-Trial Memorandum of Defendant

- 1. Statement of Party's Claim or Defense.** Plaintiff has the burden of proof on all elements of its asserted causes of action. To the extent that Plaintiff offers evidence that is not admissible at trial, or that Plaintiff's evidence is insufficient to prove the elements of its causes of action, Defendant will assert such as defenses at trial.
- 2. Party's Contentions With Respect to Controverted Points of Law.** Defendant is not presently aware of controverted points of law.
- 3. Proposed Stipulations.** Defendant does not propose any stipulations but is prepared to stipulate to the admission of the exhibits listed as numbers 1 through 7, 11 and 13 on Plaintiff's Final Pre-Trial Memorandum dated February 28, 2024.
- 4. Names and Addresses of Witnesses.** The only witness who Defendant may call is the defendant.

5. List of Trial Exhibits. Defendant does not presently expect to offer exhibits at trial except as exhibits may be offered for impeachment purposes regarding evidence offered by Plaintiff.

DATED: April 30, 2024

/s/ Thomas A. Cox
Thomas A. Cox, Esq.
Attorney for Defendant, Melissa J. Freeman

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CERTIFICATE OF SERVICE

I further certify that on April 30, 2024, I electronically filed the foregoing Final Pre-Trial Memorandum of Defendant using the CM/ECF system which will send notification of such filing to counsel for Plaintiff.

/s/Thomas A. Cox
Thomas A. Cox